

Joseph R. Saveri (State Bar No. 130064)
 Joshua P. Davis (State Bar No. 193254)
 Kevin E. Rayhill (State Bar No. 267496)
 JOSEPH SAVERI LAW FIRM, INC.
 505 Montgomery Street, Suite 625
 San Francisco, California 94111
 Telephone: (415) 500-6800
 Facsimile: (415) 395-9940
 jsaveri@saverilawfirm.com
 jdavis@saverilawfirm.com
 krayhill@saverilawfirm.com

Benjamin D. Brown (State Bar No. 202545)
 Richard Koffman (*pro hac vice* pending)
 COHEN MILSTEIN SELLERS & TOLL, PLLC
 1100 New York Ave., N.W., Suite 500, East Tower
 Washington, DC 20005
 Telephone: (202) 408-4600
 Facsimile: (202) 408 4699
 bbrown@cohenmilstein.com
 RKoffman@cohenmilstein.com

Eric L. Cramer (*pro hac vice*)
 Michael Dell'Angelo (*pro hac vice*)
 BERGER & MONTAGUE, P.C.
 1622 Locust Street
 Philadelphia, PA 19103
 Telephone: (215) 875-3000
 Facsimile: (215) 875-4604
 ecramer@bm.net
 mdellangelo@bm.net

*Attorneys for Individual and Representative Plaintiffs
 Cung Le, Nathan Quarry, Jon Fitch, Luis Vazquez,
 Dennis Hallman, Brandon Vera and Pablo Garza*

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

**Cung Le, Nathan Quarry, and Jon Fitch, on
 behalf of themselves and all others similarly
 situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
 Championship and UFC,**

Defendant.

**Case No. 5:14-cv-05484-EJD
 Case No. 5:14-cv-05591-EJD
 Case No. 5:14-cv-05621-EJD**

**STIPULATION AND [PROPOSED] ORDER
 EXTENDING DEFENDANT'S RESPONSE
 DEADLINES**

**Luis Javier Vazquez and Dennis Lloyd Hallman,
on behalf of themselves and all others similarly
situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

**Brandon Vera and Pablo Garza, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

**Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,**

Defendant.

Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Vazquez, Dennis Hallman, Brandon Vera and Pablo Garza (collectively, “Plaintiffs”) and Defendant Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC (“Zuffa”), pursuant to Civil Local Rule 6-2, request that the Court enter the parties’ stipulation below extending the time for Zuffa to respond to the complaints in this case (the “Stipulation”). This Stipulation is verified by the concurrently filed declaration of Joseph R. Saveri.

FACTS UNDERLYING THE PARTIES’ STIPULATION

In support of their Stipulation, the parties offer the following facts:

A. On December 16, 2014, Plaintiffs Le, Quarry and Fitch filed their Complaint captioned *Le, et al. v. Zuffa, LLC*, No. 5:14-cv-05484-EJD (“*Le*”).

B. On December 22, 2014, Plaintiffs Vazquez and Hallman filed their Complaint captioned *Vazquez, et al. v. Zuffa, LLC*, No 5:14-cv-05591-EJD (“*Vazquez*”).

C. On December 24, 2014, Plaintiffs Vera and Garza filed their Complaint captioned *Vera, et al. v. Zuffa, LLC*, No. 5:14-cv-05621-EJD (“*Vera*”).

D. Plaintiffs in *Le* filed a motion to relate the case on the grounds of the close similarity in the material allegations of the *Le*, *Vazquez* and *Vera* Complaints.

E. On January 7, 2015, the Court issued an order relating *Vazquez* to *Le*. (Dct. 18).

F. On January 7, 2015, the Court issued an order relating *Vera* to *Le*. (Dct. 19).

G. The parties agree that party and judicial efficiency would be best served by permitting Zuffa to have an extension to file a responsive pleading to the three pending Complaints and by establishing a consensual unified briefing schedule as to such pleading.

H. No previous extension has been sought.

STIPULATION

In light of the above facts, the parties jointly request that the Court enter the following Stipulation as the Order of the Court.

1. Undersigned counsel for Zuffa agrees to accept service of the Summonses and Complaints in *Le*, *Vazquez* and *Vera* on behalf of Zuffa. Service is deemed effective as of the date the Court enters the [Proposed] Order on the parties' Stipulation.

2. Zuffa will answer, file a motion, or otherwise respond to the Complaints in this action on or before Friday, February 27, 2015.

3. Plaintiffs' opposition brief shall be filed on or before Friday, April 10, 2015.

4. Zuffa's reply brief shall be filed on or before Friday, May 1, 2015.

5. Should this case be referred to the Judicial Panel on Multidistrict Litigation ("JPML") and transferred, Zuffa's answer, motion or other response shall be due within 45 days of receipt of written notice from Plaintiffs stating that they do not intend to file a consolidated or amended complaint, unless the transferee court sets a different schedule.

6. If this action is referred to the JPML and a Motion to Transfer is ultimately denied, Zuffa's time to answer, file motions, or otherwise respond shall be 45 days after Plaintiffs either file a consolidated complaint or give Zuffa written notice that they do not intend to file a consolidated or amended complaint.

7. In making this Stipulation, Zuffa does not waive any right, claim or defense, including but not limited to (i) any jurisdictional defenses that may be available under Fed. R. Civ. P. 12; (ii) any

1 affirmative defenses under Fed. R. Civ. P. 8; (iii) any other statutory or common law defenses that may be
 2 available to Zuffa in any currently filed or future related actions; or (iv) any right to seek or oppose any
 3 reassignment, transfer, or consolidated alternatives with respect to any of the currently filed or future
 4 related actions before the JPML or pursuant to 28 U.S.C. § 1404. Zuffa expressly reserves its right to
 5 raise any such defenses (or any other defense) in response to either the extant complaints or any amended
 6 and/or consolidated complaint that may be in any of the currently filed or future related actions.

7 8. Nothing in this Stipulation precludes Plaintiffs or Zuffa from seeking to amend the filing
 8 deadlines set forth herein. In the event that the dates are set to file answers, motions or responses in any
 9 cases that pertain to the same subject matter as the Complaints in this action (whether currently filed or
 10 filed subsequently in this or other courts), Zuffa agrees to file its answer, motion, or response in this
 11 action no later than in any such other cases.

12 IT IS SO STIPULATED.

13 Dated: January 15, 2015

JOSEPH SAVERI LAW FIRM, INC.

14 By: /s/ Joseph R. Saveri
 15 Joseph R. Saveri

16 Joseph R. Saveri (State Bar No. 130064)
 17 Joshua P. Davis (State Bar No. 193254)
 18 Andrew M. Purdy (State Bar No. 261912)
 19 Kevin E. Rayhill (State Bar No. 267496)
 20 JOSEPH SAVERI LAW FIRM, INC.
 21 505 Montgomery Street, Suite 625
 22 San Francisco, California 94111
 23 Telephone: (415) 500-6800
 24 Facsimile: (415) 395-9940
 25 jsaveri@saverilawfirm.com
 26 jdavis@saverilawfirm.com
 27 apurdy@saverilawfirm.com
 28 krayhill@saverilawfirm.com

1 Robert C. Maysey (State Bar No. 205769)
2 Jerome K. Elwell (*pro hac vice* pending)
3 WARNER ANGLE HALLAM JACKSON &
4 FORMANEK PLC
5 2555 E. Camelback Road, Suite 800
6 Phoenix, AZ 85016
7 Telephone: (602) 264-7101
8 Facsimile: (602) 234-0419
9 rmaysey@warnerangle.com
10 jelwell@warnerangle.com

11 Benjamin D. Brown (State Bar No. 202545)
12 Richard Koffman (*pro hac vice* pending)
13 Hiba Hafiz (*pro hac vice* pending)
14 COHEN MILSTEIN SELLERS & TOLL, PLLC
15 1100 New York Ave., N.W., Suite 500, East Tower
16 Washington, DC 20005
17 Telephone: (202) 408-4600
18 Facsimile: (202) 408 4699
19 bbrown@cohenmilstein.com
20 hhafiz@cohenmilstein.com

21 Eric L. Cramer (*pro hac vice*)
22 Michael Dell'Angelo (*pro hac vice*)
23 Patrick Madden
24 BERGER & MONTAGUE, P.C.
25 1622 Locust Street
26 Philadelphia, PA 19103
27 Telephone: (215) 875-3000
28 Facsimile: (215) 875-4604
ecramer@bm.net
mdellangelo@bm.net

Frederick S. Schwartz (State Bar No. 145351)
LAW OFFICE OF FREDERICK S. SCHWARTZ
15303 Ventura Boulevard, #1040
Sherman Oaks, CA 91403
Telephone: (818) 986-2407
Facsimile: (818) 995-4124
fred@fredschwartzlaw.com

*Attorneys for Individual and Representative Plaintiffs
Cung Le, Nathan Quarry, Jon Fitch, Luis Vazquez,
Dennis Hallman, Brandon Vera and Pablo Garza*

By: /s/ John F. Cove, Jr.
John F. Cove, Jr.

John F. Cove (State Bar No. 212213)
BOIES, SCHILLER & FLEXNER LLP
1999 Harrison Street
Suite 900
Oakland, CA 94612
Telephone: (510) 874-1000
Facsimile: (510) 874-1460
jcove@bsflp.com

William A. Isaacson (*pro hac vice* to be filed)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave. NW
Washington, DC 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131
wisaacson@bsflp.com

Attorneys for Defendant Zuffa, LLC

Pursuant to Local Rule 5.1(i)(3), I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: January 15, 2015

By: /s/ Joseph R. Saveri
Joseph R. Saveri

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

By:

Honorable Edward J. Davila
United States District Judge